

17 DECEMBER  
MICHAEL G. WHEAT  
S46-8437

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CLERK, U.S. DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA  
BY DEPUTY

## UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA

Plaintiff,

v.

SAAD MUTLAK ALSAHLI(1),  
MUATH AHMED ALRAQIBAH(2),  
ABDULRAHMAN ABDULLAH ALOLAYMI(3),

Defendants.

Case No. 15-3717

## COMPLAINT

Title 18, U.S.C., Section 922(g)(5)—  
Unlawful Possession of a Firearm and  
Ammunition by an Alien (FELONY).

The undersigned complainant, being duly sworn, states:

On October 18, 2015, within the Southern District of California, Defendants SAAD MUTLAK ALSAHLI, MUATH AHMED ALRAQIBAH, and ABDULRAHMAN ABDULLAH ALOLAYMI, then being aliens admitted as non-immigrant, who are prohibited from possessing firearms and ammunition, did knowingly and willfully possess, in and affecting commerce, firearms and ammunition, to wit: one Sig Sauer 9mm pistol, 50 rounds of 9mm ammunition, one Bravo Company .223 caliber rifle, and 100 rounds of .223 caliber ammunition, in violation of Title 18, United States Code, Section 922(g).

And the complainant states that this complaint is based on the attached statement of facts, which is incorporated herein by reference.




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MATTHEW SCHICK, Special Agent  
Homeland Security Investigations, DHS

SWORN TO BEFORE ME AND SUBSCRIBED IN MY PRESENCE, THIS 18 DAY OF DECEMBER 2015.




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JILL L. BURKHARDT  
U.S. Magistrate Judge

## STATEMENT OF FACTS

On October 18, 2015, SAAD MUTLAK ALSAHLI (ALSAHLI), MUATH AHMED ALRAQIBAH (ALRAQIBAH), and ABDULRAHMAN ABDULLAH ALOLAYMI (ALOLAYMI) went to On Poway Weapons and Gear (PWG) gun range, in Poway, CA, where they purchased ammunition and rented firearms. On November 3, 2015, I confirmed with the owner of PWG that on October 18, 2015, ALSAHLI, ALRAQIBAH, and ALOLAYMI each presented Saudi Arabian driver's licenses as identification in order to rent firearms and to purchase ammunition for the firearms in order to target practice. PWG provided to me photocopies of the Saudi Arabian driver's licenses.

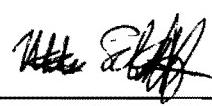
Based on this information, I queried Department of State databases, which revealed that ALSAHLI, ALRAQIBAH, and ALOLAYMI were all admitted to the United States on F-1 non-immigrant student visas. I know that non-immigrant F-1 students are prohibited from possessing firearms and ammunition absent a valid permit (18 U.S.C. §922(y)). A review of state records does not show any permits issued to ALSAHLI, ALRAQIBAH, and ALOLAYMI.

On November 6, 2015, Homeland Security Investigations (HSI) agents went to PWG gun range and obtained gun range rental records and receipts, which showed that on October 18, 2015, ALSAHLI, ALRAQIBAH, and ALOLAYMI rented a Sig Sauer 9mm pistols, fifty (50) rounds of 9mm ammunition, one Bravo Company .223 caliber assault rifle, and one hundred (100) rounds of .223. According to the

receipts, ALSAHLI, ALRAQIBAH, and ALOLAYMI split the associated range costs three ways. Based on my training and experience, and consultation with agents of the Bureau of Alcohol, Tobacco, Firearms, and Explosives, I am aware that neither of the two firearms rented or the ammunition purchased are manufactured in the State of California, and by their very presence in California they would have had to travel in and affect commerce between the states.

On November 19, 2015, HSI agents returned to the PWG gun range and obtained close circuit video surveillance footage showing ALSAHLI, ALRAQIBAH, and ALOLAYMI physically possessed the aforementioned firearms and shooting the ammunition from the firearms.

Based on the foregoing facts, I believe there is probable cause to believe that on October 18, 2015, SAAD MUTLAK ALSAHLI, MUATH AHMED ALRAQIBAH, AND ABDULRAHMAN ABDULLAH ALOLAYMI knowingly and unlawfully possessed firearms and ammunition within the Southern District of California, in violation of Title 18, U.S.C., §922(g)(5).

  
MATTHEW SCHICK, Special Agent  
Homeland security Investigations, DHS

SWORN TO BEFORE ME AND SUBSCRIBED IN MY PRESENCE, THIS 18 DAY OF DECEMBER 2015.

  
JILL L. BURKHARDT  
U.S. Magistrate Judge